

## DISCOVERY PLAN WORKSHEET

### Phase I (Pre-Settlement Discovery)

<b>Deadline for completion of Rule 26(a) initial disclosures and any HIPAA-complaint records authorizations:</b>	January 26, 2021
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<b>Completion date for Phase I Discovery as agreed upon by the parties:</b> <i>(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)</i>	March 29, 2021
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<b>Date for initial settlement conference:</b> <i>(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)</i>	April 15, 2021
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### Phase II (Discovery and Motion Practice)

<b>Motion to join new parties or amend the pleadings:</b> <i>(Presumptively 15 days post initial settlement conference)</i>	May 1, 2021
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<b>First requests for production of documents and for interrogatories due by:</b> <i>(Presumptively 15 days post joining/amending)</i>	May 15, 2021
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<b>All fact discovery completed by:</b> <i>(Presumptively 3.5 months post first requests for documents/interrogatories)</i>	September 1, 2021
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<b>Exchange of expert reports completed by:</b> <i>(Presumptively 30 days post fact discovery)</i>	October 1, 2021
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<b>Expert depositions completed by:</b> <i>(Presumptively 30 days post expert reports)</i>	November 1, 2021
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<b>COMPLETION OF ALL DISCOVERY BY:</b> <i>(Presumptively 9 months after Initial Conference)</i>	November 1, 2021
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<b>Final date to take first step in dispositive motion practice:</b> <i>(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)</i>	December 1, 2021
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<b>Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?</b>	No
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